REMARKS

The applicants thank Examiner Lieu for the interview conducted with one of the applicants, Rick Borovoy, and the applicant's representative, Misha Hill, on November 30, 2006. Mr. Borovoy demonstrated the nTag nametag devices and explained aspects of their operation. The parties discussed claims 1 and 20 and the Lightman reference, and agreed that one distinction between them is that Lightman uses a query to find whether specific items of interest can be found in another user's social network, while the claimed nametag devices compare the social networks of both devices to find overlaps. This comparison happens automatically based upon whatever information is available to the tags about their wearer's social network, not based on specific queries entered by one user, as in Lightman. It was agreed that the applicants would amend at least claim 1 to make this distinction clearer. This has been done with all the claims in the application in this Amendment.

It is respectfully requested that this application be reconsidered in view of the above amendments and the following remarks, and that all of the claims remaining be allowed.

Claims 1-20 stand rejected under 35 U.S.C. §103(a) as obvious over USP 6,711,414 Lightman, et al. (hereinafter "Lightman").

Claim 1 has been amended to further distinguish it from Lightman. Apparently, the similar terms used in the specification of the subject invention and in Lightman make the differences between them unclear. The term "social data filtering" was used by Lightman and the term "social networks" was used by applicants.

Claim 1 now has been amended to specifically point out that information about ***commonalities*** between ***two*** sets of "relationships characterizing [the] social network[s]" of two users is found. This makes it clear that the subject invention is very different from Lightman, where one user enters "his/her interest/search criteria," and these criteria are compared to a *single* set of data – the list of whom the second user has met or where he or she has been. (See col. 5, lines 63-64.) In examples of this function, Lightman describes his "social filtering" as a technique for finding people or things about which a first user is interested, but has been unable to find. Thus

Lightman's searching is based upon criteria specifically entered by the person doing the searching. (Column 9, lines 33-46.) These predetermined search criteria are compared to information collected by a second user's device to see if that second user can help the searcher find the person or thing. Examples are requesting to be notified when meeting someone who "has previously talked with a ***particular*** individual" (column 11, lines 41-48, emphasis added); or someone who "has visited an area or booth" (column 11, lines 47-48); or someone who has come across a particular product at the event (column 9, lines 35-38). Therefore Lightman uses his term "social filtering" and "social filtering criteria" in a narrow sense to mean applying specific search criteria to a set of information relating to another person who is present at the same event with the searcher.

Applicants have a much broader and more conventional meaning for their term "social network," which they have clarified by amending claim 1 to describe comparing "set[s] of relationships characterizing a social network of the first [or second] user." By comparing the sets of relationships of both users, two people at the meeting can find out immediately that they know people in common, without having to specifically input who the those people might be. (See a complete description of this on page 8, lines 8-24 of the specification.) Claim 1 recites that the comparison being made makes use of ***both sets of relationships*** – people known to the wearer and people known to another person. This is very different from what is taught or suggested by Lightman.

In view of the above remarks, amended claim 1 is believed allowable over Lightman. Claims 2-19 depend from claim 1, and are thus believed allowable for the same reasons as claim 1.

Claim 20 has been amended similarly to claim 1, to recite that relationship information is passed from one display unit to another, and commonalities are displayed. Therefore applicants believe that the rejection of claim 20 has been overcome and claim 20 is patentable for the same reasons as claim 1. In particular, the Examiner stated that, since the Lightman device is used in "social filtering," one of ordinary skill would include information relating to people known to the wearers in such "social filtering." Applicants disagree. Lightman is merely filtering through

people and data gathered by one user's device at the event, based on a specific search query to the other user's device, as explained above. (See column 9, lines 35-42; column 11, lines 41-52.") Thus, his "social filtering" has a much more limited meaning than the applicants' term "social network" and does not describe comparing two sets of relationship information to find commonalities.

Claims 21-27 stand rejected under 35 U.S.C. §103(a) over Lightman in view of Lee Publication No. 2002/0180762 (hereinafter "Lee"). Claim 21 is an apparatus claim and has been amended in a similar manner as claim 1. Amended claim 21 describes a device that compares two sets of relationship information for two users and identifies commonalities between them. As explained with regard to claim 1, Lightman describes applying a query entered by one user against a set of data characterizing another. It does not describe comparing two sets of relationships to find commonalities.

Lee does not address any such feature, thus its combination with Lightman cannot render claim 21 obvious. In addition, contrary to the Examiner's assertion, Lee does not disclose applicants' first and second display mode. Claim 21 recites that the display of the display device has two display modes: a first mode for viewing at a distance by another person, and a second mode for being read close up by the first person, who is the wearer of the display device. Therefore applicants' invention is very different from Lee. Lee (who uses the term "user" instead of "wearer") teaches, suggests and discloses that his phone is to be read ***only*** by its user. For example, in Lee's "Summary of the Invention," paragraph 0011, the stated object of his invention is to enable "a ***user*** to easily perceive an image displayed on an inverted display screen of a portable telephone hung on the ***user's*** neck through a portable telephone necklace." In another object, described in paragraph 0012, the phone is "worn on a ***user's*** belt, allowing the ***user*** to more easily perceive an image displayed on an inverted display screen of the portable telephone." [Emphasis added.]

Throughout the Lee patent, only the needs of ***the user*** are addressed. See, for example, paragraphs 0025 and 0032. Paragraph 0025 discloses the same examples discussed above. Paragraph 0032 states that "the ***user*** can easily perceive the image inversely on the LCD display

of the portable telephone attached to his waist belt or on the necklace hung around his neck." Lee does not contemplate, anywhere in his patent, that someone ***other than the user*** might view the display.

Indeed, the fact that Lee's display is on a mobile telephone teaches away from applicants' invention. With a mobile telephone, often used for very private activities such as sending credit card information to a vendor, it is specifically intended that the screen **NOT** be viewed by others when it is being used by its user. Therefore the Lee patent, directed to a mobile phone, teaches away from applicants' invention where in one mode, the display is ***intended*** to be viewed by someone other than the wearer, as clearly recited in claim 21.

Accordingly, Lee is devoid of any disclosure, teaching or suggestion that his phone display have a mode "***for viewing at a distance by a second person***."

To the contrary, applicants' display device is designed to change between a mode for being read close up by its wearer, and another mode for viewing at a distance by a second person, for example, a nearby person wearing another display device. When two badge wearers are conversing, conversation between them is facilitated if the display worn by one user is readable by the person with whom the wearer is speaking. But in that mode, it is not being read by the wearer. In some embodiments of the invention, in the mode adapted to be viewed by the other person, not only is at least a portion of the text inverted, but it may also be enlarged for better viewing at distance by someone who is not the wearer and user. These features are clearly not taught, suggested or even contemplated either by Lightman or Lee, and their combination would not result in a device having such a feature.

Therefore amended claim 21 is believed allowable under 35 U.S.C. §103(a) over Lightman in view of Lee.

Claims 21-27 depend from claim 21. Therefore they are believed allowable under 35 U.S.C. §103(a) over Lightman in view of Lee for the same reasons as claim 21.

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New claim 28 also depends from claim 1, and thus is believed allowable for the reasons set forth above with respect to claim 1.

New claim 29 also depends from claim 1, and thus is believed allowable for the reasons set forth above with respect to claim 1. In addition, neither Lightman nor Lee describe comparing two passively generated sets of data – the comparison in Lightman uses an actively entered query, and Lee describes no similar or related feature.

New claim 30 also depends from claim 1, and thus is believed allowable for the reasons set forth above with respect to claim 1.

In the event that a telephone conversation could expedite the prosecution of this application, the Examiner is requested to call the undersigned at (617) 956-5935.

Please apply any charges or credits to deposit account 06-1050.

Respectfully submitted,

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/Misha K. Hill/
Misha K. Hill, Reg. No. 59,737

Fish & Richardson P.C.
225 Franklin Street
Boston, MA 02110-2804
Telephone: (617) 542-5070
Facsimile: (617) 542-8906

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